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November 1, 2021

BY ECF ONLY

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

*The sentence remains
scheduled for 11/18. If defense
submissions are due 11/12;
the Government's are due
11/16. Denise Cote
11/2/21*

Re: **USA v. Careem Joseph, 21-cr-37 (DLC)**

Dear Judge Cote:

I am writing to respectfully request a short adjournment of Careem Joseph's sentencing scheduled for November 18, 2021, or alternatively a postponement of the deadline to file the defense submission which is presently due on November 4.

The Probation Department, under the mistaken impression that Mr. Joseph's sentencing was scheduled for November 30, issued the first draft of the PSR on October 21. After discussions with Mr. Joseph, last night I made substantive objections to the PSR. I also learned that the final PSR would not issue until November 18. When I advised Probation that the sentencing is set for November 18, I was told that the soonest the final PSR could issue is November 8.

This is an unusual case where the assessment of the Probation Department is particularly important. The combination of Mr. Joseph's letter to Your Honor and substantive objections to the Offense Conduct section of the PSR require defense counsel to know the Probation Department's determinations and recommendations before preparing a submission that can credibly advocate on Mr. Joseph's behalf.

Accordingly, I respectfully request that Your Honor adjourn the sentencing, or in the alternative that Your Honor Order the Probation Department to submit the final PSR no later than November 8 and move the deadline for the defense submission to November 12. (November 11 is a Court holiday). The Government has no objection to this request.

Thank you for your attention to this matter.

Respectfully submitted,



Jill R. Shellow

cc: Probation Officer Simone Belgrave (by email)